



3. “This action is brought under 42 U.S.C. 6101 *et seq.* known as the Age Discrimination Act of 1975 and the implementing Regulations found at 34 C.F.R. Part 110, to seek relief from Defendants’ violations of said Act and Regulations which resulted in injury to me.”

4. “I have examined all Exhibits attached to this complaint, and certify that they are true and correct copies of the documents as supplied to me from sources cited, or, if in the nature of charts and graphs, are faithful presentations of the data provided by the sources cited.”

5. “To the extent that any document may be altered, that fact is clearly noted and the reason for the alteration set forth. Examples might be the addition of paragraph numbers where none existed in the original, or highlighting or other indications of emphasis.”

6. “I first applied for admission to Baylor Law School on or about October 30, 2009, for the Law School class commencing in the fall of 2010.”

7. “I was 52 years of age when I first applied to Baylor’s Law School.”

8. “I was aware that my aging undergraduate grade point average (‘UGPA’) might unfairly prejudice my application, due to the effects of grade inflation, so I included a letter from the Texas A&M Registrar verifying my class rank. I also purposed to score high enough on the LSAT to overcome the effects of grade inflation and thus qualify for consideration for the Joseph Milton Nance Presidential Scholarship.”

9. “In February of 2010, I learned that I had been placed on the waiting list for admission, and I learned that the long-established minimum qualification required for consideration for the Joseph Milton Nance Presidential Scholarship had been changed in

**EXHIBIT**

**A**

**PLAINTIFF’S ORIGINAL COMPLAINT**

such a way as to disqualify my candidacy solely due to the age related bias inherent in the UGPA.”

10. “Also in February 2010, I complained about the change to the committee at Texas A&M which was responsible for nominating candidates for the Nance Scholarship.”

11. “In April 2010, I complained to Baylor Law School’s Assistant Dean of Admissions, Becky Beck-Chollett, in a meeting in her office. Dean Beck-Chollett read an e-mail from the committee at Texas A&M, then told me that she would work to get me admitted to the Fall 2010 class and, if she was successful, would “work with me” regarding the Nance Scholarship. I relied on her word in this matter”

12. “When classes began in August, 2010, I requested that my application be re-activated for the Fall 2011 entering class.”

13. “I have also complained about this inequity to Baylor Law School’s Scholarship Committee; requested that my complaint be registered with the Admissions Committee; formalized my complaint under Baylor University’s Policy and Procedure # 028 to the Provost and Executive Vice President, Elizabeth Davis; attended and testified at a hearing before Baylor’s Civil Rights Committee; and appealed the Provost’s decision to Baylor’s President, Kenneth Winston Starr.”

14. “At the hearing before Baylor’s Civil Rights Committee, David Swenson testified that there was no official record of the Scholarship Committee changing the requirements for the Nance Scholarship, that he could find no record at all of the change prior to its communication to Texas A&M in February, 2010 (though he had made a search), and that, ‘we do not deny that grade inflation exists.’”

**EXHIBIT**

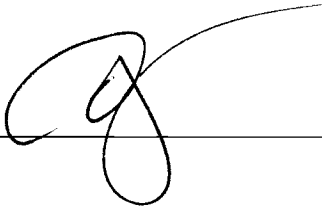
**A**

**PLAINTIFF’S ORIGINAL COMPLAINT**

**Page 3 of 4**

15. "I have not retained counsel, but may be forced to do so during the course of this action."

16. "Further, affiant sayeth not."

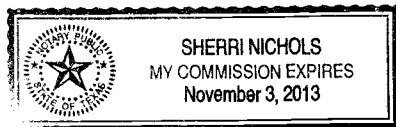


C. Michael Kamps, Affiant

**SUBSCRIBED AND SWORN TO BEFORE ME** on July 17, 2012, by C. Michael Kamps.



Notary Public, State of Texas



**EXHIBIT**

**A**

**PLAINTIFF'S ORIGINAL COMPLAINT**

## Michael Kamps

---

**From:** Welch, Doug <Doug\_Welch@baylor.edu>  
**Sent:** Tuesday, October 04, 2011 4:33 PM  
**To:** Holmes, Chris; Michael Kamps  
**Subject:** RE: Kamps complaint

Mr. Kamps:

I understand that you called Dr. Karla Leeper yesterday seeking confirmation that all internal appeals processes have been completed, and I am able to so confirm.

As indicated by Mr. Holmes, as you have offered, I would like to receive a courtesy copy of any document you file with the Department of Education.

Thanks

Doug Welch  
Assistant General Counsel  
Baylor University  
213 Pat Neff Hall  
One Bear Place, Box 97034  
Waco, Texas 76798-7034  
Telephone 254.710.3821  
Telecopier 254.710.3843  
On Campus Direct Dial 1360  
[Doug\\_Welch@Baylor.edu](mailto:Doug_Welch@Baylor.edu)

### PERSONAL AND CONFIDENTIAL COMMUNICATION:

This message is intended only for the use of the individual or entity to which it is addressed. This message contains information from the Office of General Counsel at Baylor University, which may be privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are notified that any dissemination, distribution or copying of this communication in any form is prohibited. If you receive this communication in error, delete it immediately.

---

**From:** Holmes, Chris  
**Sent:** Monday, October 03, 2011 11:39 AM  
**To:** Michael Kamps  
**Cc:** Welch, Doug  
**Subject:** RE: Kamps complaint

Michael,

Doug Welch in our office will be your contact in our office from here on. And yes, he would appreciate copies of your filings with the US Dept of Education.

Sincerely,

Chris Holmes

EXHIBIT

**B**

---

**From:** Michael Kamps [kamps@heritagefunding.com]  
**Sent:** Wednesday, September 28, 2011 11:47 PM

**To:** Holmes, Chris  
**Subject:** Kamps complaint

Dear Mr. Holmes –

As you are no doubt aware, President Starr has made a final decision on behalf of Baylor University regarding my complaint. You will not, I trust, be surprised to learn that I intend to pursue this matter further.

Specifically, I intend to complain to the United States Department of Education with regard to the Law School's age related bias. I also intend to investigate whether the unethical actions taken by the Law School give rise to any cause(s) of action under state law separate and apart from the federal question being presented to the Education Department.

In connection with these issues, it is my sense that I should probably correspond only with you, or your office, with regard to any action against the Law School or the University. Please confirm. Also, please provide me with the proper styling and entity type for the Law School and the University, and official address for service.

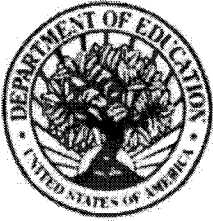
Finally, would it be of any use to your office to have a courtesy copy of the complaint I file with the US Department of Education, or would you prefer to simply wait to hear from them?

Best Regards,

C Michael Kamps  
NMLS 204466  
TX CPA 026683  
214-478-1180  
972-692-5857 (fax)  
[kamps@heritagefunding.com](mailto:kamps@heritagefunding.com)

EXHIBIT

**B**



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE FOR CIVIL RIGHTS  
DALLAS OFFICE

NOV 04 2011

Ref: 06122019

Mr. Charles Kamps  
214 Glenn Avenue  
Rockwall, TX 75087

Dear Ms. Kamps:

This is to acknowledge that the U.S. Department of Education, Office for Civil Rights (OCR), Dallas Office, received your complaint on October 27, 2011. We are currently evaluating your complaint to determine if OCR has the authority to investigate your allegation(s).

If OCR has authority to investigate, OCR requires a signed consent form when identification of the complainant is necessary to resolve the complaint. You have already provided us with a signed consent. We have enclosed the document, "OCR Complaint Processing Procedures" to provide you with an overview of our complaint evaluation and resolution process.

You should be contacted by OCR either by letter or telephone, in the near future. However, if you need to contact this office prior to that time, you may do so by calling 214/661-9600 week days between the hours of 8:30 a.m. and 5:00 p.m. Should you call, it would be helpful if you provide the reference number or name noted at the top of this letter. Your call will be referred to the team to which your complaint has been assigned.

Sincerely,

*[Signature]*  
for Vicki Johnson  
Program Manager  
Dallas Office

Enclosures

EXHIBIT

C

1999 BRYAN ST., SUITE 1620, DALLAS, TX 75201-6810  
www.ed.gov

*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

PAGE 1 of 1

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YOUR LABEL NUMBER	SERVICE	STATUS OF YOUR ITEM	DATE & TIME	LOCATION	FEATURES
RE521916516US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916520US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916533US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916547US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916555US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 29, 2012, 8:15 am	WASHINGTON, DC 20202	
RE521916564US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	June 04, 2012, 8:47 am	WASHINGTON, DC 20201	
RE521916578US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 29, 2012, 4:42 am	WASHINGTON, DC 20530	
RE521916581US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916595US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	
RE521916604US <a href="#">Restore Archived Details</a>	First-Class Mail®	Delivered	May 25, 2012, 9:00 am	WACO, TX 76706	

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**EXHIBIT****D****PAGE 1 of 1**



Applicant Name: Kamps, Charles M

LSAC Acct #: L29153447

## Law School Report

LSAC

Update Reason:

For: Fall 2010

<b>B A C K G R O U N D</b>	Soc Sec/Soc Ins # [REDACTED] 6491 Completion Date 10/30/09	<b>INSTITUTIONS ATTENDED</b>	<b>DEGREE DATE LEVEL CODE</b>
	Service Type LSDAS State of Perm. Res. TX	TEXAS A & M UNIVERSITY - COLLEGE	BBA12/79 U 6003
	Birthdate [REDACTED] 1957 Age 52 Sex MALE	UNIVERSITY OF TEXAS - ARLINGTON	U 6013
	Prev. Name Ethnicity CW	UNIVERSITY OF NORTH TEXAS	U 6481
	Undergraduate Major FINANCE	UNIVERSITY OF NORTH TEXAS	G 6481
		EASTFIELD COLLEGE	U 6201
	<b>CODE YEAR NOTES FROM TRANSCRIPT</b>	<b>CODE YEAR NOTES FROM TRANSCRIPT</b>	
	6003 75-76 Advanced Credits		

Percentage of LSAT	95 & up	90-94	85-89	80-84	75-79	70-74	65-69	60-64	55-59	50-54	45-49	40-44	35-39	30-34	25-29	20-24	0-19
	6	7	6	7	6	7	6	7	6	6	6	6	4	5	4	5	7
Percentage Distribution of GPAs	4.00 Up 1	3.80 3.99 6	3.80 3.79 9	3.80 3.79 9	3.40 3.59 9	3.20 3.39 14	3.00 3.19 13	2.80 2.99 11	2.60 2.79 13	2.40 2.5% 10	2.20 2.39 6	2.00 2.19 5	1.80 1.99 1	1.60 1.79 0	1.59 Down 0		

TRANSCRIPT ANALYSIS	Year	75-76	76-76	76-77	77-77	78-78	78-79	79-79	81-81
	Education Level	U	U	U	U	U	U	U	G
	College	TEX CST	EASTFLD	TEX CST	UNOTEX	UTEXARL	TEX CST	TEX CST	UNOTEX
	College Code	6003	6201	6003	6481	6013	6003	6003	6481
	LSAT College Mean		INSF		536	521		555	
	Num. Candidates		INSF		150	144		465	
	Semester Hours	29.0	3.0	32.0	3.0	3.0	40.0	17.0	
	GPA	2.66	4.00	3.63	3.00	3.00	3.38	2.88	SEE TRANS
	Cum. GPA/College	2.66	4.00	3.17	3.00	3.00	3.25	3.20	
	Cum. GPA Percentile Rank		INSF		42%	39%		62%	
	GPA College Mean		INSF		3.10	3.12		3.02	
	Cum. Across GPA	2.66	2.79	3.21	3.20	3.19	3.26	3.21	
GRADES EARNED TOTAL NUMBER OF SEMESTER HOURS BY GRADE FOR EACH SCHOOL - DATE - PERIOD									
3.50 & Up	A	45.0	3.0	3.0	20.0	0.0	0.0	18.0	1.0
2.50 - 3.49	B	66.0	16.0	0.0	12.0	3.0	3.0	19.0	13.0
1.50 - 2.49	C	13.0	7.0	0.0	0.0	0.0	0.0	3.0	3.0
0.50 - 1.49	D	3.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0
0.49 - Down	F	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Unconverted		3.0	3.0	0.0	0.0	0.0	0.0	0.0	0.0
Total		130.0	32.0	3.0	32.0	3.0	3.0	40.0	17.0

<b>S U M M A R Y</b>	<b>LSAT Score Data</b>					<b>Undergraduate Summary</b>			
	Score Band	Score	Percent Rank	Admin. Date	Index	Degree (Summary) GPA		Cumulative GPA	
	166-172	169	97	09-09	201	Semester Hours 118.0		Semester Hours 127.0	
	=====					Nonpunitive "NC", "WF", and "Repeated" Course Credit Hours			
	166-172	169	Average		201	Letters of Recommendation			
						Number of letters included in this report: 0			
						Law School Matriculation			
						Prior law school matriculation or intent to matriculate reported by:			
						Recipients of this report are cautioned to contact the named law school to verify the information reported here.			
						Misconduct or Irregularity Determination			
					NO				
+ No Reportable Score - LSAC Action / No Reportable Data - Data Cancelled - No Reportable Score - Candidate Action - No Reportable Score - Absent or Score Delayed					<b>Score Band</b> Score Bands on this report reflect a 99% level of confidence. 120 130 140 150 160 170 180 Lower=166 Average Score=169 Upper=172				

Charles M Kamps  
214 Glenn Avenue  
Rockwall, TX 75087

BAYLOR UNIVERSITY SCHOOL OF LAW

6032

Report Date: 10/30/2009

EXHIBIT

Prior Application:

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E

Charles Michael Kamps

UIN 7578310